

~~MEMO ENDORSED~~

Ryan P. Poscablo
 +1 212 506 3921 direct
 rposcablo@steptoe.com

Steptoe

1114 Avenue of the Americas
 New York, NY 10036-7703
 212 506 3900 main
 www.steptoe.com

USDC SDNY
 DOCUMENT
 ELECTRONICALLY FILED
 DOC#: _____
 DATE FILED: 6/5/23

May 25, 2023

Via ECF and E-Mail

Hon. Andrew L. Carter
 United States District Judge
 Southern District of New York
 Thurgood Marshall United States Courthouse
 40 Foley Square
 New York, New York 10007

Re: *United States v. Barend Oberholzer*, 1:21-cr-00475-ALC

Dear Judge Carter:

I am writing on behalf of defendant Barend Oberholzer to respectfully request that the Court modify Mr. Oberholzer's bail conditions to allow him to travel to Sarasota, Florida, for a business trip, leaving June 12, 2023 and returning June 15, 2023. If permitted to travel, Mr. Oberholzer will provide his Supervising Pretrial Officer with a complete itinerary.

Pretrial Services, by PTSO Dominique Jackson, takes no position on Mr. Oberholzer's application. The government, by AUSA Jilan Kamal, also takes no position on Mr. Oberholzer's application.

By way of background, on March 2, 2021, Judge Lehrburger released Mr. Oberholzer on a \$500,000 personal recognizance bond secured by two financially responsible persons, with conditions including, *inter alia*, that Mr. Oberholzer's travel be limited to the Southern and Eastern Districts of New York, and the Central and Southern Districts of California. Since that date, Mr. Oberholzer has remained compliant with the conditions of his release.

We thank the Court for its consideration in this matter.

Respectfully submitted,

/s/ Ryan P. Poscablo
 Ryan P. Poscablo, Esq.

cc: Jilan Kamal, Esq., Assistant United States Attorney (by ECF)
 Dominique Jackson, Pretrial Services (by email)

So Ordered:



Hon. Andrew L. Carter, Jr. **6/5/23**